

**IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA**

In re:

LESLIE McDANIEL,

Debtor

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* CHAPTER 13

* CASE NO. 12-41231-JTL

* JUDGE LANEY

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LESLIE McDANIEL, Individually and as
Representative of her Bankruptcy Estate,

Plaintiff,

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v.

SUNTRUST BANK, SUNTRUST

MORTGAGE, INC., McCALLA

RAYMER, LLC, FOXFIRE ACRES, INC.,

THE UNITED STATES by and through

THE INTERNAL REVENUE SERVICE,

THE STATE OF GEORGIA

(Represented by the DEPARTMENT OF

REVENUE), THE GROGAN GROUP,

LLC d/b/a GROGAN & GROGAN, and

THE COLUMBUS CONSOLIDATED

GOVERNMENT,

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Defendants.

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MOTION FOR SUMMARY JUDGMENT

COMES NOW McCalla Raymer, LLC (“McCalla Raymer”), and pursuant to Fed. R. Civ. P. 56 and Bankruptcy Rule 7056, hereby moves the Court for summary judgment as to all of plaintiff’s claims, respectfully showing the Court the following:

1.

In support of this Motion, McCalla Raymer relies on the following:

- (a) the pleadings;
- (b) McCalla Raymer's Statement of Undisputed Facts, filed herewith;
- (c) the deposition of Leslie McDaniel, taken on July 8, 2014, filed herewith;
- (d) McCalla Raymer's Brief in Support of its Motion for Summary Judgment, filed herewith; and
- (e) all other matters of record.

2.

There is no genuine issue of material fact and McCalla Raymer is entitled to judgment as a matter of law.

WHEREFORE, McCalla Raymer respectfully requests that the Court inquire into and grant its Motion for Summary Judgment, enter final judgment in favor of McCalla Raymer, and tax all costs on Plaintiff.

Respectfully submitted, this 22nd day of August, 2014.

PAGE, SCRANTOM, SPROUSE,
TUCKER & FORD, P.C.

By: s/Alan G. Snipes

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served either electronically or via U.S. Mail with adequate first class postage to the addresses below on the following persons:

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This 22nd day of August, 2014.

/s Alan G. Snipes